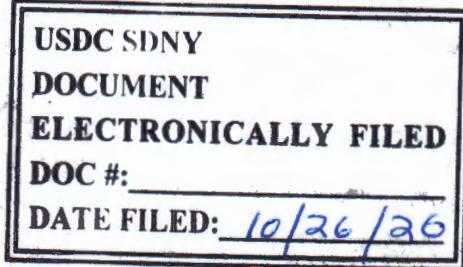


**Federal Defenders  
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David E. Patton  
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Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

October 25, 2020

**BY ECF**

The Honorable Judge Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. Anthony Young  
20 Cr. 201 (KMW)**

Honorable Judge Wood:

I write on behalf of my client, Anthony Young, to respectfully request that the Court modify Mr. Young's bail conditions to allow him to reside in a residential treatment center rather than home detention. This is Mr. Young's first bail modification request. The Government does not object to this request.

On February 27, 2020, Mr. Young was presented in Magistrate Court. The defense reserved a bail application without prejudice to make a bail argument at a later date. Magistrate Judge Sarah L. Cave ordered Mr. Young detained. On March 11, 2020, the Government filed an Indictment in Mr. Young's case. On March 13, 2020, Mr. Young was arraigned on the Indictment and a bail hearing was held in Magistrate Court before Magistrate Judge Ona T. Wang. Magistrate Judge Wang set the following bail conditions:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; pretrial supervision as directed by Pretrial Services; drug testing and treatment as directed by Pretrial Services; surrender all travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York; home detention; GPS location monitoring; no possession of firearms/destructive devices/other weapons; maintain residence approved by Pretrial Services and not to change residence; and no contact with co-defendants outside the presence of counsel.<sup>1</sup>

Granted  
KMW

<sup>1</sup> There are no co-defendants in Mr. Young's case.

Judge Wang further ordered that Mr. Young was to remain detained until all conditions were met. Pretrial Services did not approve the residence the defense had proposed for Mr. Young to live during the pendency of his case. As a result, Mr. Young has remained incarcerated at the Metropolitan Correctional Center since his presentment on February 27, 2020.

Late last week, the defense confirmed that Mr. Young had been accepted to the residential treatment program Samaritan Village. Given Mr. Young's medical needs and the conditions of confinement at the Metropolitan Correctional Center in light of the Covid-19 pandemic, Mr. Young respectfully requests that the Court modify his bail conditions to replace the condition of home detention with the condition that Mr. Young reside in a residential treatment facility. The Government does not oppose this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**

*Kimba M. Wood*  
HONORABLE KIMBA M. WOOD  
UNITED STATES DISTRICT JUDGE

cc: Assistant United States Attorney Sarah Kushner